

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY T. ROMAN

[DOB: 05/16/1965]

Defendant.

Case No. _____

COUNTS ONE AND TWO:

Cyberstalking

18 U.S.C. § 2261A(2)

NMT: Five Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: NMT Three Years

Class D Felony

\$100 Mandatory Special Assessment Each Count

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Cyberstalking)

Between on or about October 18, 2021, and October 28, 2021, said dates being approximate, in the Western District of Missouri and elsewhere, the defendant, **GREGORY T. ROMAN**, with the intent to harass and intimidate Victim 1, used an interactive computer service, and an electronic communication service, and an electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce, to engage in a course of conduct that placed Victim 1 in reasonable fear of death or serious bodily injury, and that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Victim 1, all in violation of Title 18, United States Code, Section 2261A(2).

COUNT TWO
(Cyberstalking)

Between on or about October 18, 2021, and October 22, 2021, said dates being approximate, in the Western District of Missouri and elsewhere, the defendant, **GREGORY T. ROMAN**, with the intent to harass and intimidate Victim 2, used an interactive computer service, and an electronic communication service, and an electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce, to engage in a course of conduct that placed Victim 2 in reasonable fear of death or serious bodily injury, and that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Victim 2, all in violation of Title 18, United States Code, Section 2261A(2).

A TRUE BILL.

/s/ Sharon Williams

FOREPERSON OF THE GRAND JURY

/s/ Alison Dunning for _____
David Luna
Assistant United States Attorney

Date: 1/4/2022
Kansas City, Missouri